

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JOHN COREY FRASER, ET AL.,

Plaintiffs

v.

**BUREAU OF ALCOHOL,
TOBACCO, FIREARMS
AND EXPLOSIVES, ET AL.,**

Defendants

Case No. 3:22-cv-00410

**PLAINTIFFS' AND PROPOSED PLAINTIFF'S MOTION TO ADD JUSTIN FRASER
AS PLAINTIFF OR GRANT INTERVENTION**

COME NOW, the Plaintiffs, Mr. John “Corey” Fraser, Mr. Joshua Clay McCoy, Mr. Tyler Dalton McGrath, and Mr. Ian Fletcher Shackley, by and through counsel, and on behalf of themselves and a Class of those similarly situated, and Mr. Justin Timothy Fraser, the proposed Plaintiff and Intervenor, (collectively “Movants”), and respectfully move this honorable Court to add Mr. Justin Timothy Fraser to this suit pursuant to Rule 21 or, in the alternative, allow him to intervene as a plaintiff pursuant to Rule 24.

SUMMARY

1. Movants bring this motion to ensure the existence of a live controversy in this case and in furtherance of judicial economy.
2. Plaintiffs challenge federal laws that prohibit licensed firearm dealers from selling handguns and handgun ammunition to young adults between the ages of eighteen and twenty-one years old.
3. The District Court granted the Plaintiffs’ Motion for Summary Judgment and denied the Defendants’ Motion to Dismiss.

4. The Defendants (hereinafter “the Government”) may seek an appeal.
5. Movants’ principal request for this Court is to add Mr. Justin Timothy Fraser as a plaintiff pursuant to Rule 21 of the Federal Rules of Civil Procedure.
6. In the alternative, Movants request that the Court allow Mr. Justin Timothy Fraser to intervene as a plaintiffs pursuant to Rule 24.
7. In accordance with Rule 24(c), this motion is accompanied by Mr. Justin Timothy Fraser’s proposed Complaint in intervention.

For these reasons those set forth in the accompanying brief, this Court should grant Movants’ motion and ORDER that Mr. Justin Timothy Fraser be added or granted leave to intervene in this case.

Respectfully submitted,

_____/s_____
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CERTIFICATE OF SERVICE

On May 18, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Virginia, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

_____/s_____
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